

1. What navigational hazards do vessels operating in the study areas face? Please describe.
2. Are there strains on the current vessel routing system, such as increasing traffic density? If so, please describe.
3. What are the benefits and drawbacks to modifying existing vessel routing measures, if any, or establishing new routing measures such as those described in the NMFS ANPRM? If so, please describe.
4. What impacts, both positive and negative, would changes to existing routing measures, if any, or new routing measures, such as those described in the NMFS ANPRM, have on the study area?

My marina is home and host to a number of recreational vessels, of all types and sizes. I do not now, nor have I ever, considered myself or my customers part of the shipping industry. I don't see where I have any valuable input at all to help you shape traffic zones for the large ships of the ocean. Applying my body of knowledge to their industry really makes no sense.

Imagine my surprise then when I discovered in the ANPRM that their solution for reducing ship strikes was going to be applied to my industry. Trying to regulate everything that floats under one set of rules is pure folly. If there is a true and verifiable problem with recreational vessels causing strike mortalities in Right Whales it should be explored and a solution set proposed. Until then, recreational vessels should be excluded from the implementation actions of the Ship Strike Reduction Plan, including the current discussion of Port Access Routes.

Personally, I do not believe there is a problem with interaction between Right Whales and recreational vessels. The killer of whales is momentum, being defined and mass times speed. Recreational vessels simply do not have the mass to inflict the bone crushing injuries seen in most ship strike mortalities. When after all, was the last time you heard of a recreational boat returning to port with a whale stuck to its bow?

The image would be comical if it weren't indicative of the situation I find myself in. This is not a conversation that I have any place in, and will be more than happy to leave, but you need to clearly define what a ship is so that a well intentioned rule does not have unintended consequences.

Thank You,

Rick Weber
South Jersey Marina